

EXHIBIT A

Praxair Defendants' Motion to Redact and Seal Letters and Exhibits on Public Docket in <i>Lawson, et al. v. Praxair, Inc., et al.</i>				
Material	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is not Available	Party in Opposition to Sealing, if any, and Basis
Plaintiffs' May 26, 2021 Application to compel Praxair's answers to punitive damages discovery [D.E. 440] ECF #440	Plaintiffs' May 26, 2021 Application to compel Praxair's answers to punitive damages discovery [D.E. 440]	Citations and reference to confidential deposition testimony of Michael Skrijanc, Shaun LaGrange, and James White about sensitive business information, and citations and references to Praxair's internal confidential documents that contain sensitive business information.	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within the Skrijanc, LaGrange, and White deposition transcripts and the confidential internal documents would cause Praxair a competitive disadvantage and financial harm among its customers and competitors if disclosed to the public.	Praxair seeks to seal only certain references to the Skrijanc, LaGrange and White deposition testimony and Praxair's internal documents, which have been designated confidential in this case

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ECF #440-Exhibit B	Confidential Praxair Materials Engineering Lab Report	Praxair's internal confidential documents that contain sensitive business information.	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within Praxair's confidential Materials Engineering Lab Report would cause Praxair a competitive disadvantage.	Praxair seeks to seal Exhibit B (Materials Engineering Lab Report), which has been designated confidential in this case.
ECF #440-Exhibit C	Confidential Praxair witness statement	Praxair's internal confidential documents that contain sensitive business information.	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within Praxair's confidential witness statement would cause Praxair a competitive disadvantage.	Praxair seeks to seal Exhibit C (Confidential Witness Statement), which has been designated confidential in this case.

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ECF #440 – Exhibit D	Praxair's internal confidential communications that contain sensitive business information.	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within Praxair's confidential internal email would cause Praxair a competitive disadvantage.	Praxair seeks to seal Exhibit D (Confidential internal email), which has been designated confidential in this case.	No opposition anticipated
ECF #440 – Exhibit E, I, Q	Michael Skrijanc Deposition Transcript	Confidential deposition testimony about sensitive business information	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within Mr. Skrijanc's deposition would cause Praxair a competitive disadvantage.	Praxair seeks to seal Exhibits E, I and Q (Skrijanc Transcript), said portions of which have been designated confidential in this case.

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ECF #440 – Exhibit F	Shaun LaGrange Deposition Transcript	Confidential deposition testimony about sensitive business information	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within Mr. LaGrange's deposition would cause Praxair a competitive disadvantage.	Praxair seeks to seal Exhibit F (LaGrange Transcript), said portions of which have been designated confidential in this case.
ECF #440 – Exhibit G	James White Deposition Transcript	Confidential deposition testimony about sensitive business information	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within Mr. White's deposition would cause Praxair a competitive disadvantage.	Praxair seeks to seal Exhibit G (White Transcript), said portions of which have been designated confidential in this case.
ECF #440 – Exhibit H	Confidential Praxair letter to the FDA	Praxair's internal confidential documents that contain sensitive business information.	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within Praxair's letter to the FDA would cause Praxair a competitive disadvantage.	Praxair seeks to seal Exhibit H (Letter to the FDA), which has been designated confidential in this case.

Praxair Defendants' Motion to Redact and Seal Letters and Exhibits on Public Docket in <i>Lawson, et al. v. Praxair, Inc., et al.</i>				
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ECF #440 – Exhibit J	Praxair's internal confidential documents that contain sensitive business information.	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within Praxair's letter to UMCPP would cause Praxair a competitive disadvantage.	Praxair seeks to seal Exhibit J (Letter to UMCPP), which has been designated confidential in this case.	No opposition anticipated
ECF #440 – Exhibit R	Praxair's internal confidential spreadsheet	Praxair's internal confidential documents that contain sensitive business information.	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within Praxair's confidential spreadsheet would cause Praxair a competitive disadvantage.	Praxair seeks to seal Exhibit R (Confidential spreadsheet) which has been designated confidential in this case.
ECF #440 – Exhibit T	Praxair's internal confidential documents that contain sensitive business information.	Praxair's internal confidential documents that contain sensitive business information.	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within Praxair's letter to UMCPP would cause Praxair a competitive disadvantage.	Praxair seeks to seal Exhibit T (Letter to UMCPP), which has been designated confidential in this case.

Praxair Defendants' Motion to Redact and Seal Letters and Exhibits on Public Docket in <i>Larson, et al. v. Praxair, Inc., et al.</i>				
Material	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is not Available	Party in Opposition to Sealing, if any, and Basis
ECF #440 – Exhibit U	Confidential Praxair letter to the FDA	Praxair's internal confidential documents that contain sensitive business information.	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within Praxair's letter to the FDA would cause Praxair a competitive disadvantage.	Praxair seeks to seal Exhibit U (Letter to the FDA), which has been designated confidential in this case.
ECF #440 – Exhibit V	Confidential Praxair draft letter to the FDA	Praxair's internal confidential documents that contain sensitive business information.	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within Praxair's draft letter to the FDA would cause Praxair a competitive disadvantage.	Praxair seeks to seal Exhibit V (Draft letter to the FDA), which has been designated confidential in this case.
ECF #440 – Exhibit X	Martin Frith Deposition Transcript	Confidential deposition testimony about sensitive business information	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within Mr. Frith's deposition would cause Praxair a competitive disadvantage.	Praxair seeks to seal Exhibit X (Frith Transcript), said portions of which have been designated confidential in this case.

Praxair Defendants' Motion to Redact and Seal Letters and Exhibits on Public Docket in <i>Lawson, et al. v. Praxair, Inc., et al.</i>				
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ECF #440 – Exhibit Y	Confidential letter from FDA to Praxair	Praxair's internal confidential documents that contain sensitive business information.	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within the FDA's letter to Praxair would cause Praxair a competitive disadvantage.	Praxair seeks to seal Exhibit Y (FDA Letter to Praxair), which has been designated confidential in this case. No opposition anticipated
ECF #452 – Praxair's Opposition Brief	Praxair's Opposition to Plaintiffs' Motion to Compel Punitive Damages Discovery [D.E. 452]	Citations and reference to confidential deposition testimony of Barbara Yost, Martin Frith, and Michael Skrijanc about sensitive business information, and citations and references to Praxair's internal confidential documents that contain sensitive business information.	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within the Yost, Frith and Skrijanc deposition testimony and Praxair's internal confidential documents would cause Praxair a competitive disadvantage. No opposition anticipated	Praxair seeks to seal only certain references to the Yost, Frith and Skrijanc deposition testimony and Praxair's internal documents, which have been designated confidential in this case. No opposition anticipated

Praxair Defendants' Motion to Redact and Seal Letters and Exhibits on Public Docket in <i>Lawson, et al. v. Praxair, Inc., et al.</i>				
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ECF #452-Exhibit A	Praxair's internal confidential documents that contain sensitive business information.	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within this Material Safety Data Sheet would cause Praxair a competitive disadvantage	Praxair seeks to seal portions of Exhibit A (Praxair Material Safety Data Sheet), which has been designated confidential in this case.	No opposition anticipated
ECF #452-Exhibit B	Praxair's internal confidential documents that contain sensitive business information.	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within this confidential Product Supply Agreement would cause Praxair a competitive disadvantage	Praxair seeks to seal Exhibit B (Product Supply Agreement), which has been designated confidential in this case.	No opposition anticipated

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ECF #452 – Exhibit C	Praxair's internal confidential documents that contain sensitive business information.	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within Praxair's letter to the FDA would cause Praxair a competitive disadvantage.	Praxair seeks to seal Exhibit C (Letter to the FDA), which has been designated confidential in this case.	No opposition anticipated
ECF #452 – Exhibit G	Barbara Yost Deposition Transcript	Confidential deposition testimony about sensitive business information	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within Ms. Yost's deposition would cause Praxair a competitive disadvantage.	Praxair seeks to seal Exhibit G (Yost Transcript), said portions of which have been designated confidential in this case.
ECF #452 – Exhibit H	Praxair letter to the FDA	Praxair's internal confidential documents that contain sensitive business information.	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within Praxair's letter to the FDA would cause Praxair a competitive disadvantage.	Praxair seeks to seal Exhibit H (Letter to the FDA), which has been designated confidential in this case.

Praxair Defendants' Motion to Redact and Seal Letters and Exhibits on Public Docket in <i>Lawson, et al. v. Praxair, Inc., et al.</i>				
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ECF #452 – Exhibit K	Praxair's internal confidential documents that contain sensitive business information.	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within Praxair's letter to the FDA would cause Praxair a competitive disadvantage.	Praxair seeks to seal Exhibit K (Letter to the FDA), which has been designated confidential in this case.	No opposition anticipated
ECF #452 – Exhibit L	Martin Frith Deposition Transcript	Confidential deposition testimony about sensitive business information	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within Mr. Frith's deposition would cause Praxair a competitive disadvantage.	Praxair seeks to seal Exhibit L (Frith Transcript), said portions of which have been designated confidential in this case.
ECF #452 – Exhibit M	Michael Skrijanc Deposition Transcript	Confidential deposition testimony about sensitive business information	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within Mr. Skrijanc's deposition would cause Praxair a competitive disadvantage.	Praxair seeks to seal Exhibit M (Skrijanc Transcript), said portions of which have been designated confidential in this case.

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ECF #452 – Exhibit P	Praxair's internal confidential documents that contain sensitive business information.	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within Praxair's email to the FDA would cause Praxair a competitive disadvantage.	Praxair seeks to seal Exhibit P (Email to the FDA), which has been designated confidential in this case.	No opposition anticipated
ECF #461 – Plaintiffs' Reply Brief in Support of Motion to Compel Punitive Damages Discovery [D.E. 461]	Citations and reference to confidential deposition testimony of Martin Frith, Michael Skrijanc and Nelson Moreira about sensitive business information, and citations and references to Praxair's internal confidential documents that contain sensitive business information.	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within the Frith, Skrijanc and Moreira deposition testimony and Praxair's internal confidential documents would cause Praxair a competitive disadvantage.	Praxair seeks to seal only certain references to the Frith, Skrijanc and Moreira deposition testimony and Praxair's internal documents, which have been designated confidential in this case.	No opposition anticipated

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ECF #461 – Exhibit Z	Confidential internal email	Praxair's internal confidential communications that contain sensitive business information.	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within Praxair's confidential internal email would cause Praxair a competitive disadvantage.	Praxair seeks to seal Exhibit Z (Confidential internal email), which has been designated confidential in this case. No opposition anticipated
ECF #461 – Exhibit AA	Confidential internal email	Praxair's internal confidential communications that contain sensitive business information.	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within Praxair's confidential internal email would cause Praxair a competitive disadvantage.	Praxair seeks to seal Exhibit AA (Confidential internal email), which has been designated confidential in this case. No opposition anticipated

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ECF #461 – Exhibit BB	Confidential internal spreadsheet	Praxair's internal confidential documents that contain sensitive business information.	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within Praxair's confidential spreadsheet would cause Praxair a competitive disadvantage.	Praxair seeks to seal Exhibit BB (Confidential spreadsheet) which has been designated confidential in this case.
ECF #461 – Exhibit CC	Martin Frith Deposition Transcript	Confidential deposition testimony about sensitive business information	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within Mr. Frith's deposition would cause Praxair a competitive disadvantage.	Praxair seeks to seal Exhibit CC (Frith Transcript), said portions of which have been designated confidential in this case.
ECF #461 – Exhibit EE	Confidential Praxair letter to the FDA	Praxair's internal confidential documents that contain sensitive business information.	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within Praxair's letter to the FDA would cause Praxair a competitive disadvantage.	Praxair seeks to seal Exhibit EE (Letter to the FDA), which has been designated confidential in this case.

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ECF #461 – Exhibit FF, HH	Michael Skrijanc Deposition Transcript	Confidential deposition testimony about sensitive business information	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within Mr. Skrijanc's deposition would cause Praxair a competitive disadvantage.	Praxair seeks to seal Exhibits FF and HH (Skrijanc Transcript), said portions of which have been designated confidential in this case.
ECF #461 – Exhibit GG	Nelson Moreira Deposition Transcript	Confidential deposition testimony about sensitive business information	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within Mr. Moreira's deposition would cause Praxair a competitive disadvantage.	Praxair seeks to seal Exhibit GG (Moreira Transcript), said portions of which have been designated confidential in this case.

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ECF #461 – Confidential internal sales document	Praxair's internal confidential communications that contain sensitive business information.	The legitimate private interest that warrants sealing is that a public disclosure of the commercially sensitive information contained within Praxair's confidential internal sales document would cause Praxair a competitive disadvantage.	Praxair seeks to seal Exhibit II (Confidential internal sales document), which has been designated confidential in this case.	No opposition anticipated